

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

FRENZETTA WILSON and RONNIE
DICKERSON, on behalf of themselves and
all others
similarly situated,

Plaintiffs,

v.

SANTANDER CONSUMER USA, Inc.,

Defendant.

CIVIL ACTION NO. 4:20-cv-00152-KGB

**UNOPPOSED MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

Plaintiffs Frenzetta Wilson and Ronnie Dickerson (“Plaintiffs” or “Settlement Class Representatives”), on behalf of themselves and all others similarly situated and in accord with the Settlement Agreement and Release (the “Settlement Agreement”) entered into between Plaintiffs and Defendant Santander Consumer USA, Inc. (“SC” or “Defendant”), respectfully move this Court for preliminary approval of the proposed settlement (the “Settlement”) of the above-referenced action (the “Action”). More specifically, Plaintiffs request this Court enter an order, substantially in the form attached to the Settlement Agreement as Exhibit 2, (i) granting preliminary approval of the proposed Settlement; (ii) preliminarily certifying the Settlement Class for settlement purposes only; (iii) appointing Plaintiffs as Settlement Class Representatives; (iv) approving Plaintiffs’ Counsel as counsel for the Settlement Class; (v) directing that notice of the proposed Settlement be given to members of the Settlement Class in the proposed form and manner; and (vi) scheduling a hearing before the Court to determine whether the proposed Settlement should be finally approved.

A memorandum of law in support of the instant motion is being contemporaneously filed herewith.

Dated: April 12, 2022

Respectfully submitted,

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